

**UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 CV 3160
	)	
EGAN MARINE CORPORATION,	)	Judge Coar
<i>in personam</i> ,	)	Magistrate Judge Cox
MOTOR VESSEL LISA E, <i>in rem</i> , and	)	
TANK BARGE EMC-423, <i>in rem</i> ,	)	
	)	In Admiralty
Defendants.	)	

**MOTION FOR LEAVE TO FILE ADDITIONAL  
APPEARANCES ON BEHALF OF EGAN MARINE CORPORATION, MOTOR  
VESSEL LISA E, and TANK BARGE EMC-423**

NOW COME Attorneys John P. O'Malley and Thomas W. Mulcahy and respectfully request that this Honorable Court grant them leave to file additional appearances on behalf of Egan Marine Corporation, Motor Vessel Lisa E., and Tank Barge EMC-423. In support thereof, counsel states as follows:

1. On August 28, 2008, Great American Insurance Company of New York filed a Motion to Intervene in the instant lawsuit [Docket Entry No. 39]. The Motion to Intervene was scheduled for presentment on September 4, 2008, but was entered and continued for hearing to September 16, 2008, with responses to be filed by September 9, 2008. [Docket Entry No. 44].

2. John P. O'Malley and Thomas W. Mulcahy are fully admitted to the United States District Court for the Northern District of Illinois and are counsel of record in a previously filed lawsuit captioned *Egan Marine Corporation, et al. v. Great American Insurance Company of New York* that was filed in 2005 before Judge Kennelly (No. 05 C 5295).

3. Egan Marine Corporation, Motor Vessel Lisa E, and Tank Barge EMC-423 have requested that Attorneys O'Malley and Mulcahy enter their additional appearances in this matter for purposes of responding to the Motion to Intervene.

WHEREFORE, John P. O'Malley and Thomas W. Mulcahy respectfully request that this Honorable Court grant them leave to file additional appearances on behalf of Egan Marine Corporation, Motor Vessel Lisa E, and Tank Barge EMC-423 for the purpose of responding to Great American Insurance Company of New York's Motion to Intervene and for any other and further relief that this Court deems just and appropriate.

Respectfully submitted,

By:           /s/ Thomas W. Mulcahy          

John P. O'Malley  
Thomas W. Mulcahy  
Crisham & Kubes, Ltd.  
30 N. LaSalle Street, Suite 2800  
Chicago, Illinois 60602  
(312) 327-2500  
Atty. No.: 6272757  
[tmulcahy@crishamlaw.com](mailto:tmulcahy@crishamlaw.com)  
[jomalley@crishamlaw.com](mailto:jomalley@crishamlaw.com)